

**RICHARD A. SMITH, WSBA 15127**  
**SMITH LAW FIRM**  
**314 No. Second Street**  
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Attorneys for Defendant  
Juan Bravo Zambrano

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF WASHINGTON**  
**(Honorable Edward F. Shea)**

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

Jese David Casillas Carrillo (2);  
Rosa Araceli Grandado (3); Francisco  
Duarte Figueroa (6); Gabriela Mendoza  
Vasquez (7); Brittney Lee Zaragoza  
(10); Salvador Gudino Chavez (11);  
Juvenal Landa Solano (14); Erica Maria  
Solis (15); Edgar Omar Herrera Farias  
(16); Juan Bravo Zambrano (19);  
Miguel Reyes Garcia (21); Jose Adrian  
Mendoza (23); and Veronica Elvira  
Cortez (24),  
Defendants.

NO. 4:15-cr-06049-EFS-19

JOINT PROPOSED CASE  
MANAGEMENT DEADLINES

**TO: Clerk, U.S. District Court, Eastern District of Washington; and**  
**TO: Stephanie A. Van Marter, Assistant United States Attorney.**

JOINT PROPOSED CASE MANAGEMENT DEADLINES -  
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Pursuant to the Court's order of August 31, 2017 to meet and confer regarding proposed amended deadlines, counsel for Juan Zambrano (19) prepared a proposed Amended Case Management Order and distributed the same on September 7, 2017 to all defense counsel for review, objections or corrections. At the same time defense counsel distributed the same to Assistant United States Attorney Stephanie Van Marter on September 7, 2017 requesting her review, revisions, objections or correction.

Having received no objections, corrections or revisions from defense counsel or Assistant United States Attorney Van Marter, defense counsel submits the following proposed dates and deadlines in this matter:

	<b>Recommended Dates</b>
Rule 16 expert summaries produced to other parties and emailed to Court:  USAO's Experts (not previously disclosed) Defendant's Experts USAO's Rebuttal Experts	November 15, 2017 December 15, 2017 January 2, 2018
1 <sup>st</sup> Pretrial Conference	December 19, 2017
Final Pretrial Conference ( <i>Deadline for motions to continue trial</i> )	March 6, 2018
CI's identities, Giglio disclosures and willingness to be interviewed disclosed to Defendant (if applicable)	January 2, 2018
Grand Jury transcripts disclosed to Defendant:	

1	Case Agent	January 2, 2018
2	CI's (if applicable)	January 2, 2018
3	Other witnesses	January 2, 2018
4	Exhibit lists filed and emailed to the Court	February 26, 2018
5	Witness Lists filed and emailed to the Court	February 26, 2018
6	Trial briefs, jury instructions, verdict forms, and	February 26, 2018
7	requested voir dire filed and emailed to Court	February 26, 2018
8	Exhibit binders delivered to all other parties	February 26, 2018
9	Whether any witness likely to exercise Fifth	February 26, 2018
10	Amendment rights and requires appointed counsel	February 26, 2018
11	Delivery of JERS-compatible digital evidence files	February 26, 2018
12	to the Courtroom Deputy	February 26, 2018
13	Trial notices filed with Court	February 26, 2018
14	Exhibit binders delivered to the Court	March 12, 2018
15	Technology readiness meeting (in-person)	March 12, 2018
16	<b>JURY TRIAL</b>	<b>March 26, 2018</b>
17		<b>Richland</b>

22  
23 DATED this 12th day of September, 2017.

24  
25 Presented by: ***Smith Law Firm***

26  
27 /s/ RICHARD A. SMITH

28 RICHARD A. SMITH, WSBA 15127

29 Attorney for Defendant Zambrano (19)

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on September 12, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Stephanie A. Van Marter, Assistant United States Attorney; and  
Defense Counsel

/s/ Lugene M. Borba

LUGENE M. BORBA